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T.R.A. DOCKET ROOM

October 5, 2004

Hon Pat Miller, Chairman
Tennessee Regulatory Authority
460 James Robertson Pkwy.
Nashville, Tennessee 37243

Re. *Petition of Integrated Resource Management Utility, Inc. to Amend Its
Certificate of Convenience and Necessity*
Docket No. 04-00268

Dear Chairman Miller:

Enclosed please find the original and fourteen (14) copies of Petition to Intervene and Motion to Consolidate filed on behalf of Tennessee Wastewater Systems, Inc.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: *Henry Walker*
Henry Walker _{KG}

HW/krq

990612 v1
105845-001 10/5/2004

- 1 -

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990612

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

**IN RE: PETITION OF INTEGRATED RESOURCE MANAGEMENT UTILITY,
INC. TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY**

DOCKET NO. 04-00268

PETITION TO INTERVENE AND MOTION TO CONSOLIDATE

Tennessee Wastewater Systems, Inc. ("TWS"), petitions the Tennessee Regulatory Authority ("TRA"), pursuant to Tennessee Code Annotated Section 4-5-310, to allow TWS to intervene in the above-captioned Petition of Integrated Resource Management Utility, Inc. to provide waste water service in certain areas within Blount County known as LashBrooke subdivision. In support of this Petition, TWS submits that:

1. TWS is presently providing and maintaining service to an adjacent development known as Jackson Bend Subdivision (Docket Number 01-00221) (See Exhibit A).

2. TWS has also filed a petition to provide waste water service to LashBrook Subdivision. Docket Number 04-00334

3. TWS maintains that since it is already providing service to an adjoining subdivision, it is better positioned to provide more efficient service to LashBrook

4. The outcome of the above-captioned proceeding will have a direct impact on the rights, duties, privileges, immunities, or other legal interests of TWS. Moreover, granting this Petition to Intervene is in the interests of justice and will not impair the orderly and prompt conduct of the proceedings.

5. For these reasons, this Petition to Intervene should be granted

6. Since both IRM and TWS have applied to serve the same subdivision, the TRA should consolidate the two applications and set a hearing, as soon as practicable, to determine which applicant is better suited to provide service to this area.

Respectfully submitted,

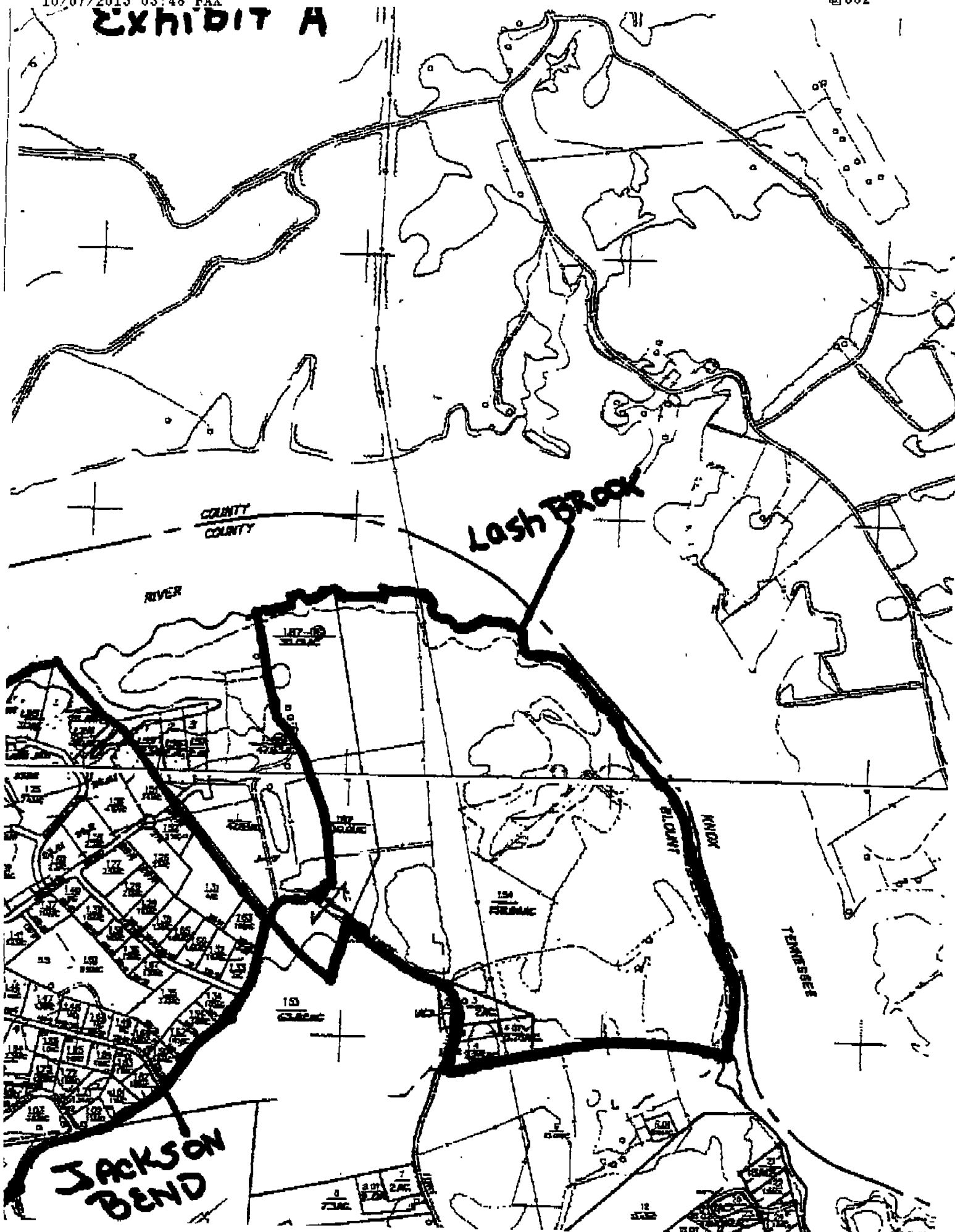
BOULT, CUMMINGS, CONNERS & BERRY, PLC

By

A handwritten signature in black ink, appearing to read "Henry Walker", is written over a horizontal line.

Henry Walker
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EXHIBIT A

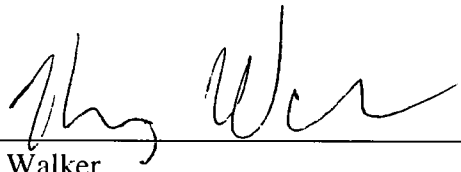


CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document has been served upon the following persons by hand delivery or by United States Mail, with proper postage thereon.

Charles B. Welch, Jr.
Attorney for IRM
618 Church Street, Suite 300
Nashville, TN 37219

This 5th day of October, 2004



Henry Walker